## BOEHM, KURTZ & LOWRY

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PUBLIC SERVICE COMMISSION

Via Overnight Mail

December 21, 2010

Mr. Jeff Derouen, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

Re: Case No. 2010-00443

Dear Mr. Derouen:

Please find enclosed the original and twelve (12) copies of the PETITION TO INTERVENE OF ALCAN PRIMARY PRODUCTS CORPORATION AND CENTURY ALUMINUM OF KENTUCKY GENERAL PARTNERSHIP filed in the above-referenced matter. By copy of this letter, all parties listed on the Certificate of Service have been served.

Please place this document of file.

Very Truly Yours,

Michael L. Kurtz, Esq.

**BOEHM, KURTZ & LOWRY** 

MLKkew Attachment

cc:

David C. Brown, Esq. Certificate of Service

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by first-class postage prepaid mail, (unless otherwise noted) to all parties on the 21<sup>st</sup> day of December, 2010.

Honorable Tyson A Kamuf Attorney at Law Sullivan, Mountjoy, Stainback & Miller, PSC 100 St. Ann Street P.O. Box 727 Owensboro, KY 42302-0727

Michael L. Kurtz, Esq.

**BOEHM, KURTZ & LOWRY** 

## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of: 2010 Integrated Resource Plan of		
Big Rivers Electric Corporation	:	Case No. 2010-00443

PETITION TO INTERVENE OF
ALCAN PRIMARY PRODUCTS CORPORATION AND
CENTURY ALUMINUM OF KENTUCKY GENERAL PARTNERSHIP

Pursuant to K.R.S. §278.310 and 807 KAR 5:001 Section 3(8), Alcan Primary Products Corporation and Century Aluminum of Kentucky, General Partnership ("Alcan/Century") request that they be granted full intervenor status in the above-captioned proceeding and state in support thereof as follows:

- 1. Alcan/Century are by far the biggest power consumers in Kentucky. They have a combined demand of approximately 850 MW and consume more than seven billion kWh annually. Alcan/Century are retail ratepayers of Kenergy Corporation ("Kenergy"). Kenergy is part owner of Big Rivers Electric ("Big Rivers") and purchases generation and transmission service from Big Rivers.
- 2. The matters being decided by the Commission in this case may have a significant impact on the long-term availability, adequate supply and cost of electric power to Alcan/Century. Electricity represents a significant cost of doing business for Alcan/Century and is critical to the continued economic viability of their operations. The attorneys for Alcan/Century authorized to represent them in this proceeding and to take service of all documents are:

David C. Brown, Esq. **STITES & HARBISON** 1800 Providian Center

400 West Market Street Louisville, KY 40202

Ph: (502) 587-3400 Fax: (502) 587-6391

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COUNSEL FOR ALCAN PRIMARY PRODUCTS CORPORATION

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COUNSEL FOR ALCAN PRIMARY PRODUCTS CORPORATION AND CENTURY ALUMINUM OF KENTUCKY GENERAL PARTNERSHIP

3. The position of Alcan/Century cannot be adequately represented by any existing party. Alcan/Century intends to play a constructive role in the Commission's investigation and decision making process herein and their participation will not unduly prejudice any party.

WHEREFORE, Alcan/Century request that they be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,

David C. Brown (mc)

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December 21, 2010